

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JASON FRAZIER and EARL
FERGUSON,**

Plaintiffs,

v.

**FULTON COUNTY
DEPARTMENT OF
REGISTRATION AND
ELECTIONS,**

**SHERRI ALLEN, AARON
JOHNSON, MICHAEL HEEKIN,**
And **TERESA K. CRAWFORD,**
individually, and in their official
capacities as Members of the Fulton
County Department of Registration
and Elections,

KATHRYN GLENN, individually,
and in her official capacity as
Registration Manager of the Fulton
County Department of Registration
and Elections,

BRAD RAFFENSPERGER,
in his official and individual
capacities

Defendants.

CIVIL ACTION NO.

1:24-cv-03819-SCJ

**FULTON COUNTY DEFENDANTS' RESPONSE TO PLAINTIFFS'
MOTION TO DISMISS**

COME NOW, the Fulton County Department of Registration and Elections, Sherri Allen, Aaron Johnson, Michael Heekin, Teresa K. Crawford, and Kathryn Glenn (the “Fulton County Defendants”), and hereby files their Response to Plaintiffs’ Motion to Dismiss.

The Fulton County Defendants are in agreement with Plaintiffs that Plaintiffs have failed to meet a condition precedent for seeking relief in this Court as required under 52 U.S.C. § 20510. The Fulton County Defendants submit that Plaintiffs have also failed to bring a valid claim against the Fulton County Defendants in this matter. Therefore, the Fulton County Defendants do not object to Plaintiffs’ motion to dismiss this action and respectfully request that this Court dismiss this action.

Respectfully submitted this 19th day of September, 2024.

OFFICE OF THE FULTON COUNTY ATTORNEY

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/s/ Juliana Sleeper
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that the undersigned counsel has presented this

document in Times New Roman, 14 point type in accordance with L.R. 5.1(C) and served a copy of the foregoing **FULTON COUNTY DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO DISMISS** through the CM/ECF system which will automatically send electronic mail notification of such filing to parties and counsel of record.

This 19th day of September, 2024

/s/ Juliana Sleeper

Juliana Sleeper

Senior Assistant County Counsel

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